

# Exhibit C



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# Transcript of Ruth Smith

**Date:** December 2, 2022

**Case:** Smith -v- SunPath, Ltd.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

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RUTH SMITH, individually :

and on behalf of all :

others similarly situated, :

Plaintiffs, : Case No.:

v. : 1:22-cv-00081-LMB-TCB

SUNPATH, LTD., a :

Massachusetts corporation, :

Defendant. :

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Deposition of RUTH SMITH

McLean, Virginia

Friday, December 2, 2022

9:56 a.m. EST

Job No: 472707

Pages: 1 - 213

Reported by: Kelly Carnegie, CSR, RPR

Transcript of Ruth Smith

December 2, 2022

53

1 (Discussion off the record from 11:00  
2 a.m. to 11:00 a.m.)

3 MR. CAFFAS: Let's go back on the  
4 record.

5 Can you reread my last question, Kelly.

6 (The reporter read the requested  
7 testimony.)

8 BY MR. CAFFAS:

9 Q Why would you have to refer to your  
10 notes?

11 A For the exact language.

12 Q Do you remember anything about the  
13 language that led you to make that statement that  
14 the purpose of the call was to solicit the sale of  
15 SunPath's vehicle service contracts?

16 A Based on my memory, they gave the name  
17 of the company and what they were -- what they  
18 were -- I think what they were selling.

19 Q When you say the name of the company,  
20 what was the name of the company?

21 A SunPath.

22 Q You say that they used the word